

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT PERMIT NO. F-06-041
R & S GODWIN TRUCK BODY COMPANY LLC
8555 SOUTH US 23 IVEL, KENTUCKY 41642
FROUGH SHERWANI, REVIEWER
PLANT I.D. # 021-071-00157
AI # 38060
ACTIVITY # APE20040001

SOURCE DESCRIPTION:

The R & S Godwin truck body company manufactures truck body at Ivel KY.

On June August 11, 2004, the source submitted a Conditional Major permit application.

The source has three spray booths and welding machines.

COMMENTS:

Type of control and efficiency:

All the three spray booths have fabric filters to control particulate matter. The control efficiency of the filter is assumed to be 90%.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

APPLICABLE REGULATION:

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

PRECLUDED REGULATIONS:

40CFR 63 Subpart M- National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

EMISSION AND OPERATING CAPS DESCRIPTION:

- a. The source has accepted a facility-wide cap on annual VOC emissions of no more than 50.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 5.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 12.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.